

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

**RECEIVED**  
MAR 24 2000  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Truth-in-Billing )

and )

Billing Format )

CC Docket No. 98-170

**Supplement to March 21, 2000  
Petition for Temporary, Limited Waiver**

The Petitioning Local Exchange Companies ("Petitioners") that filed a Petition for Temporary, Limited Waiver on March 21, 2000 in the above-captioned proceeding ("Petition"), by counsel, hereby file this Supplement to include three (3) additional companies in the Petition, Chazy & Westport Telephone Corp., Piedmont Rural Telephone Cooperative, Inc., and West Side Telecommunications, Inc. (the "Companies").<sup>1</sup> Like the Petitioners, the Companies hereby seek temporary, limited waiver of the Truth-in-Billing ("TIB") requirements, set forth in 47 C.F.R. § 64.2400, established by the Federal Communications Commission ("Commission" or "FCC") in its First Report and Order and Further Notice of Proposed Rulemaking in the above-captioned matter.<sup>2</sup>

The factual circumstances confronting each of the Companies is substantially similar to that confronting each of the Petitioners, as stated in the Petition. Moreover, the policy bases and

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<sup>1</sup> Attachment B hereto are the declarations of each of the Companies joining this Supplement, along with a revised copy of "Attachment A" which adds the names of the Companies to the list of Petitioners originally included in the Petition. The declarations contain facsimile signatures. The original signed declarations will be filed with the Commission upon receipt by counsel.

<sup>2</sup> In the Matter of Truth-in-Billing and Billing Format, First Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 98-170, FCC 99-72, released May 11, 1999, 64 Fed. Reg. 34488 (June 25, 1999) ("TIB Order"); Errata, CC Docket No. 98-170, DA 99-2092, released October 6, 1999.

No. of Copies rec'd 014  
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remedial measures that each Company will take during the time that the requested waivers are in effect are the same. Accordingly, this Supplement is filed in order to add the Companies to the list of Petitioners, without unnecessarily burdening the record with pleadings that duplicate the Petition. In the event the Commission deems it necessary, however, the Companies will file separate waiver requests.

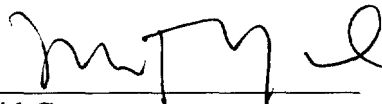
For the reasons stated in the Petition and the attachments, compliance with the April 1, 2000 effective date for certain of the TIB rules is technically and economically infeasible due to circumstances beyond the Companies' control, despite their reasonable efforts. Accordingly, the Companies, like the Petitioners, respectfully submit that a grant of this request for the time periods specified in the attachments will ensure that the Companies can implement the Commission's TIB directives in an efficient manner while avoiding unnecessary and wasteful expense. At the same time, and for the same reasons stated in the Petition, the consumer goals of these TIB rules will not be frustrated by a grant of this request in light of the conditions that each Company has agreed should be part of the relief.

Accordingly, in the event that action on the pending United States Telecom Association Petition does not grant the extent of the relief requested herein, the Companies request a waiver of the applicable TIB rules for the time periods specified in Attachment B.

Respectfully submitted,

Chazy & Westport Telephone Corp.  
Piedmont Rural Telephone Cooperative, Inc.  
West Side Telecommunications, Inc.

By



David Cosson  
Thomas J. Moorman  
Margaret Nyland

Attachment A  
Attachment B

Kraskin, Lesse & Cosson, LLP  
2120 L Street, NW, Suite 520  
Washington, DC 20037  
202-296-8890

Their Attorneys

March 24, 2000

Attachment A  
List of Petitioning Local Exchange Companies

Armstrong Telephone Company - Maryland  
Armstrong Telephone Company - New York  
Armstrong Telephone Company - North  
Armstrong Telephone Company - Northern Division  
Armstrong Telephone Company - Pennsylvania  
Armstrong Telephone Company - West Virginia  
Colorado Valley Telephone Cooperative, Inc.  
Chazy & Westport Telephone Corp.  
Chicamauga Telephone Corporation  
Diamond Telephone Services, Inc.  
Fulton Telephone Company  
Gulf Pines Communications, LLC  
Mound Bayou Telephone and Communications, Inc.  
Deerfield Farmers' Telephone Company  
DeKalb Telephone Cooperative, Inc. dba DTC Communications  
Germantown Telephone Company  
Home Telephone Company, Inc.  
North Pittsburgh Telephone Company  
Piedmont Rural Telephone Cooperative, Inc.  
Pine Belt Telephone Company, Inc.  
Poka Lambro Telephone Cooperative, Inc.  
Poka Lambro Telecommunications, Inc.  
    dba Poka Lambro Telephone Company  
Valley Telephone Cooperative, Inc.  
Copper Valley Telephone, Inc.  
West Side Telecommunications, Inc.

## Attachment B

**CHAZY & WESTPORT TELEPHONE CORP.**

Chazy & Westport Telephone Corp. ("Petitioner") provides exchange and exchange access services to approximately 3,700 access lines in New York. The Petitioner is a member of the United States Telecom Association and is a rural telephone company under the Communications Act of 1934, as amended. The Petitioner provides billing and collection services for third party providers including such services for certain interexchange carriers' 1+ traffic and for providers of casual calling and alternate operator services. The Petitioner utilizes APTIS for the provision of end user billing software. Petitioner has made frequent periodic contacts with its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements and has made reasonable and good-faith efforts to ensure that APTIS would be taking all necessary steps to ensure that the software upgrades and modifications to its end user billing system would be made in sufficient time to allow proper testing. Despite these efforts, it was not until March 9, 2000 that APTIS indicated that it would not be able to meet the April 1, 2000 date, and provided the necessary information that enabled Petitioner to assess what TIB compliance issues remained. Despite the Petitioner's reasonable, good-faith efforts, the delays in providing the necessary software upgrades and, in turn, the inability to conduct the proper testing were beyond Petitioner's control.

Based on the information that APTIS has provided to date, Petitioner requests the following waivers for the time periods noted.

<u>TIB Rule Requirement</u>	<u>Rule Provision(s)</u>	<u>Requested Extension</u>
TIB New Service Provider Requirement	47.C.F.R. §64.2401(a)(2)	August 1, 2000
TIB Service Provider Name and Inquiry Contact Requirement	47 C.F.R. §64.2401(a)(1)-(2) and 47 C.F.R. §64.2401(d)	August 1, 2000

Until the requested waiver expires, the Petitioner will provide the appropriate bill message and/or insert and the customer service responses identified in the Petition.

**DECLARATION OF WILLIAM P. MURRAY**

I, William P. Murray, General Manager of Chazy & Westport Telephone Corp. ("Petitioner"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein and on this attachment regarding Petitioner is true and accurate to the best of my knowledge, information, and belief.

Date 3/24/00

  
 William P. Murray  
 General Manager

**Chazy & Westport Telephone  
Summary of Chronological vendor contacts**

**Numerous telephone conversations beginning November 8, 1999  
with Aptis, discussing the Truth in Billing regulations.**

**Fax to Aptis on 11/8/99 Truth in Billing 11/12/99 Rules.**

**Frequent telephone conversations, emails and facsimiles to  
and from Aptis from November 1999 through March 24, 2000  
discussing status of compliance issues.**

**PIEDMONT RURAL TELEPHONE COOPERATIVE, INC.**

Piedmont Rural Telephone Cooperative, Inc. ("Petitioner") provides exchange and exchange access services to approximately 12,500 access lines in South Carolina. As a telephone cooperative, Petitioner provides end user billing services to its members/owners. The Petitioner is a member of the United States Telecom Association and is a rural telephone company under the Communications Act of 1934, as amended. The Petitioner provides billing and collection services for third party providers including such services for certain interexchange carriers' 1+ traffic and for providers of casual calling and alternate operator services. The Petitioner utilizes APTIS for the provision of end user billing software. Petitioner has made frequent periodic contacts with its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements and has made reasonable and good-faith efforts to ensure that APTIS would be taking all necessary steps to ensure that the software upgrades and modifications to its end user billing system would be made in sufficient time to allow proper testing. Despite these efforts, it was not until March 15, 2000 that APTIS indicated that it would not be able to meet the April 1, 2000 date, and provided the necessary information that enabled Petitioner to assess what TIB compliance issues remained. Despite the Petitioner's reasonable, good-faith efforts, the delays in providing the necessary software upgrades and, in turn, the inability to conduct the proper testing were beyond Petitioner's control.

Based on the information that APTIS has provided to date, Petitioner requests the following waivers for the time periods noted.

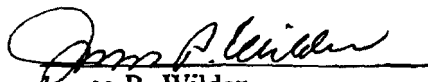
<u>TIB Rule Requirement</u>	<u>Rule Provision(s)</u>	<u>Requested Extension</u>
TIB New Service Provider Requirement	47.C.F.R. §64.2401(a)(2)	July 1, 2000
TIB Deniable/Nondeniable Requirement	47.C.F.R. §64.2401(c)	July 1, 2000

Until the requested waiver expires, the Petitioner will provide the appropriate bill message and/or insert and the customer service responses identified in the Petition.

**DECLARATION OF JAMES P. WILDER**

I, James P. Wilder, General Manager of Piedmont Rural Telephone Cooperative, Inc. ("Petitioner"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein and on this attachment regarding Petitioner is true and accurate to the best of my knowledge, information, and belief.

Date 24/MAR/00

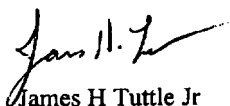
  
James P. Wilder  
General Manager



A Timeline of conversations between Piedmont Rural Telephone and Aptis  
Concerning

## Truth and Billing

1. On Aug 10<sup>th</sup> 1999 PRTC asked Aptis to perform whatever work that was needed to conform our Billing System to the "Truth and Billing" requirements.
2. On Nov 19<sup>th</sup> PRTC received and discussed with Aptis the requirements for and the cost involved to make our Billing System compliant for "Truth and Billing"
3. On Jan 19<sup>th</sup> 2000 PRTC had at least three conversations as to why the work had not been started and discovered that some paperwork had been lost. The paperwork was resent
4. On Feb 4<sup>th</sup> 2000 there was more conversation about the start date of the work.
5. On Feb 11<sup>th</sup> 2000 there was a discussion between PRTC and Aptis as to the scope of the work. Aptis wanted us to tell them what work we wanted them to perform. We informed Aptis that we required them to do whatever was needed in order for us to be in compliance with the ruling for "Truth and Billing"
6. On Feb 22<sup>nd</sup> 2000 PRTC had two conversations with Aptis concerning "Truth and Billing" in which we discussed the cost involved in making the changes and that Aptis had just become aware of some changes in the requirements.
7. On Feb 24<sup>th</sup> 2000 PRTC had two conversations with Aptis, one concerning the requirement we thought we needed to meet and the second about the cost involved to make the changes in our system.
8. On Feb 28<sup>th</sup> 2000 PRTC again questioned Aptis as to when the work was going to be completed and was told that we would be notified.
9. On Feb 29<sup>th</sup> 2000 PRTC had three conversations with Aptis concerning "Truth and Billing" We were informed that Phase one was completed. There were two conversation concerning who the contact should be for the second phase of work.
10. On Mar 3<sup>rd</sup> 2000 PRTC questioned the progress of the work being done and was informed that there might be a problem and that we might need an extension.
11. On Mar 6<sup>th</sup> 2000 PRTC contacted Aptis and informed them that if they were not going to be able to finish the required work on time that we would need a letter from them stating this along with the reasons for the delay and an estimated date of completion.
12. On Mar 9<sup>th</sup> 2000 Aptis again stated that they might not be able to perform the needed work by the dead line.
13. On Mar 15<sup>th</sup> PRTC received form Aptis a letter stating that they would not be able to complete the needed work on time and that they were asking all their clients to file for a 90 day extension.



James H Tuttle Jr  
Informations System Manager  
Piedmont Rural Telephone Cooperative

## Issue Type:

Modification

Issue Number	TT Num	Date Received	Project/ Module	Called In By	Date Completed	Submitted By	Due In	Current Status
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Request:

Action:

17327

08/18/99 Telephony

Jim Tuttle

Lehtinen, Erike

Assign Dev

Request: Company needs to conform to "Truth in Billing" Bill format required by FCC.

Action: Researching what information is necessary. EML

Sent to Classic Telephony. EML

\*\*\*\*\*

Modification

Number of Issues: 2

3-24-00:10:28AM:PRTC

;864692888

# 4 / 14

**Jim Tuttle**

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**From:** Dave Johnson [DJOHNSON@commsoft.net]  
**Sent:** Friday, November 19, 1999 4:23 PM  
**To:** 'JIMT@PRTC.COM.COM'  
**Subject:** tRUTH IN bILLING



Truth In Billing.doc

Jim...

Here's a copy of the truth in billing estimate..... keep in mind that the quote is based on someone who would need all of these things done.... i believe that you already print by carrier and break apart charges based on carrier id.... You will probably need a Carrier file that will address the carrier id... a listed number.... and space for messages. We can install that along with a screen to maintain it. One thing we'll also build in would be functionality to print messages based on the customers class of service ex: residential / business.... that way you can have a number and message separte for each if you want. Please look at the estimate and let me know if you think we missed something or if you'll need anything else done. The cost to do what i mentioned above would be done on the hourly charge. Give me a call if you have any questions...

Have a happy Thanksgiving,  
Dave

<<Truth In Billing.doc>>

**LeighAnn Nastasia**

**From:** LeighAnn Nastasia  
**Sent:** Wednesday, January 19, 2000 1:21 PM  
**To:** 'Jim Tuttle'  
**Subject:** RE: T&C

Ok, I understand. There was some miscommunication here - let me see what I can do to get you that T&C estimate asap. I was under the impression that you already had it. I'll get back to you soon!

## -----Original Message-----

**From:** Jim Tuttle [SMTP:JimT@prtcom.com]  
**Sent:** Wednesday, January 19, 2000 1:20 PM  
**To:** 'LeighAnn Nastasia'  
**Subject:** RE: T&C

You will have to send me a copy first. We had talked about it before but I never received anything....Jim

## -----Original Message-----

**From:** LeighAnn Nastasia [<mailto:leighann.nastasia@aptissoftware.com>]  
**Sent:** Wednesday, January 19, 2000 1:11 PM  
**To:** 'Jim Tuttle - PRT'  
**Subject:** T&C

Hi Jim:

I spoke to Nadeem (he's the programmer in charge of your Truth in Billing issue), and he would like to get started on this. We need to have you return (fax) the signed copy of the T&C estimate prior to beginning the work. Thank you.

Sincerely,

-----

Leighann J. Nastasia  
Business Analyst  
Aptis, A Subsidiary of Billing Concepts  
Phone: 518-431-7524  
<mailto:leighann.nastasia@aptissoftware.com>  
<http://www.aptissoftware.com>

---

**LeighAnn Nastasia**

**From:** LeighAnn Nastasia  
**Sent:** Friday, February 04, 2000 8:55 AM  
**To:** 'Jim Tuttle - PRT'  
**Subject:** 17327

Hi Jim:

I just wanted to check with you about this one - could you get it signed and faxed to us today? That would be great.

Thanks,

-----

**Leighann J. Nastasia**  
Business Analyst  
*Aptis, A Subsidiary of Billing Concepts*

Phone: 518-431-7524

<mailto:leighann.nastasia@aptissoftware.com>

<http://www.aptissoftware.com>

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**LeighAnn Nastasia**

**From:** LeighAnn Nastasia  
**Sent:** Tuesday, February 22, 2000 10:53 AM  
**To:** 'Jim Tuttle - PRT'  
**Cc:** Dave Johnson  
**Subject:** TT issues - 3

Hi Jim: I let the owners of 22501 and 22963 know that you were looking for an update. As for the other one (22766), I do have that one in my possession- tolls program and PIC change. We received it on Feb. 2 - this one has recently been assigned to Nadeem Jafri for resolution. He will contact you once it is completed.

Also, I will sit down with our manager, Dave Johnson, today to discuss the charges for 17327 and 17324. You should hear from us shortly. Thank you.

Sincerely,

-----

**Leighann J. Nastasia**

Business Analyst

*Aptis, A Subsidiary of Billing Concepts*

Phone: 518-431-7524

<mailto:leighann.nastasia@aptissoftware.com>

<http://www.aptissoftware.com>

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**LeighAnn Nastasia**

**From:** LeighAnn Nastasia  
**Sent:** Tuesday, February 22, 2000 2:27 PM  
**To:** 'Jim Tuttle - PRT'  
**Cc:** Dave Johnson  
**Subject:** 17327 and 17324

Hi Jim: I wanted to update you on these issues. Dave Johnson will contact you to discuss the details about these soon (including our bills to Piedmont). Nadeem has finished the changes for 17327 (Truth in Billing), but he has not put them live yet. There have been some changes to the 002B module, which we recently learned about. You will hear from Dave soon. Thank you.

Sincerely,

-----

**Leighann J. Nastasia**

Business Analyst

*Aptis, A Subsidiary of Billing Concepts*

Phone: 518-431-7524

<mailto:leighann.nastasia@aptissoftware.com>

<http://www.aptissoftware.com>

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**LeighAnn Nastasia**

**From:** LeighAnn Nastasia  
**Sent:** Thursday, February 24, 2000 2:14 PM  
**To:** 'Jim Tuttle - PRT'  
**Subject:** 18847 and Atlas

Hi Jim: In response to your additional questions, I will check with Sara VanDusen on 18447 (Multiple Billing Cycles), and she will be the one to get back to you on this. Also, I will check with Mike Donnelly on your Atlas reimbursement- Dave Johnson says everything should have been taken care of here, so Mike will be the one who knows. I will have him (MD) contact you regarding this issue.

~~An additional \$1000 will be added to your bill if you do not pay by the due date.~~

We will call you next week to inform you when we are going live on your system with the Truth in Billing issue [REDACTED]. Thank you.

Sincerely,

**Leighann J. Nastasia**  
Business Analyst  
*Aptis, A Subsidiary of Billing Concepts*  
Phone: 518-431-7524  
<mailto:leighann.nastasia@aptissoftware.com>  
<http://www.aptissoftware.com>

**LeighAnn Nastasia**

**From:** LeighAnn Nastasia  
**Sent:** Monday, February 28, 2000 9:15 AM  
**To:** 'Jim Tuttle - PRT'  
**Cc:** Sara Van Dusen  
**Subject:** File cleanup

Hi Jim: FYI, I asked about cleaning up unnecessary files on your system. Sara Van Dusen said she would take care of the Financial files, and Chris Hayes deleted some of his files.

As for your billing cycle question (number of cycles), I do not have the details yet. We'll contact you when we do.

I will let you know when we will go live for the Truth in Billing implementations (Phase I).

Sincerely,

**Leighann J. Nastasia**  
Business Analyst  
*Aptis, A Subsidiary of Billing Concepts*  
Phone: 518-431-7524  
<mailto:leighann.nastasia@aptissoftware.com>  
<http://www.aptissoftware.com>

## LeighAnn Nastasia

**From:** Sara Van Dusen  
**Sent:** Tuesday, February 29, 2000 10:04 AM  
**To:** LeighAnn Nastasia  
**Subject:** RE: PRT

Hi Sara: I spoke to Jim Tuttle this morning. He has more questions about his Atlas reimbursement. He thought that the funds could be put towards programming costs? I said I would check to see who needs to repond to him. I believe Dave had spoken to him, but I don't know the details.

**[Sara Van Dusen]** They will give him a credit on his bill after it is determined that they paid for it and how much. So yes he can apply the credit to the new programming. Also, he is still wondering about the Billing Cycle question (18447). Is this something I should be handling at this point, or should I let him know that he needs to speak with you? **[Sara Van Dusen]** I sent Tammy a couple of bill cycle questions and comments, I believe this is part of what she is currently doing for them so you can still handle this since Tammy is working on it. I will forward the emails I sent Tammy. I believe she has to answer his question.

Truth in Billing issues: I need to speak with Dave about these. I am unsure how Phase II will be handled for PRT. **[Sara Van Dusen]** Do you know who did phase 1?

Thanks,

-----  
**Leighann J. Nastasia**

Business Analyst

*Aptis, A Subsidiary of Billing Concepts*

Phone: 518-431-7524

<mailto:leighann.nastasia@aptissoftware.com>

<http://www.aptissoftware.com>

---

**LeighAnn Nastasia**

**From:** LeighAnn Nastasia  
**Sent:** Tuesday, February 29, 2000 10:25 AM  
**To:** 'Jim Tuttle - PRT'  
**Cc:** 'Jim Wilder - PRT'; Sara Van Dusen; Nadeem Jafri  
**Subject:** 3 issues  
Hi Jim(s):

1) I spoke with Sara about issue #18447 (Billing Cycles). Tammy Terranova will remain the owner of this issue and continue working toward a resolution for you. I have communicated to Tammy that she needs to contact you to give you details on the billing cycle and answer your questions. She will be contacting you regarding this issue.

2) Sara is awaiting Jim Wilder's confirmation on the credit for Atlas. Please contact Sara.

3) A) Nadeem will be able to implement Phase I for Truth in Billing this week (issue #17327). You may continue to contact ME about this. I will let you know when the implementation is complete.

B) As for TIB Phase II, you will work with Sara's unit for the necessary changes. Please forward all Phase II correspondences to Sara as your needs become known.

Thank you.

Sincerely,

-----  
**Leighann J. Nastasia**

Business Analyst

*Aptis, A Subsidiary of Billing Concepts*

Phone: 518-431-7524

<mailto:leighann.nastasia@aptissoftware.com>

<http://www.aptissoftware.com>

---

**LeighAnn Nastasia**

**From:** LeighAnn Nastasia  
**Sent:** Tuesday, February 29, 2000 11:14 AM  
**To:** 'Jim Tuttle - PRT'  
**Cc:** 'Jim Wilder - PRT'; Sara Van Dusen; Mary Hutson  
**Subject:** FW: 3 issues - CORRECTION

Please forward all Truth in Billing Phase II requirements to the Business Analyst for your team, who is MARY HUTSON. Thank you.

-----Original Message-----

**From:** Sara Van Dusen  
**Sent:** Tuesday, February 29, 2000 11:00 AM

To: LeighAnn Nastasia  
Subject: RE: 3 issues

Actually he should forward his phase 2 stuff to Mary.

-----Original Message-----

From: LeighAnn Nastasia  
Sent: Tuesday, February 29, 2000 10:25 AM  
To: 'Jim Tuttle - PRT'  
Cc: 'Jim Wilder - PRT'; Sara Van Dusen; Nadeem Jafri  
Subject: 3 Issues

Hi Jim(s):

1) I spoke with Sara about issue #18447 (Billing Cycles). Tammy Terranova will remain the owner of this issue and continue working toward a resolution for you. I have communicated to Tammy that she needs to contact you to give you details on the billing cycle and answer your questions. She will be contacting you regarding this issue.

2) Sara is awaiting Jim Wilder's confirmation on the credit for Atlas. Please contact Sara.

3) A) Nadeem will be able to implement Phase I for Truth in Billing this week (issue #17327). You may continue to contact ME about this. I will let you know when the implementation is complete.

B) As for TIB Phase II, you will work with Sara's unit for the necessary changes. Please forward all Phase II correspondences to Sara as your needs become known.

Thank you.

Sincerely,

-----  
**Leighann J. Nastasia**  
Business Analyst  
*Aptis, A Subsidiary of Billing Concepts*  
Phone: 518-431-7524  
<mailto:leighann.nastasia@aptissoftware.com>  
<http://www.aptissoftware.com>



**Jim Tuttle**

---

**From:** Mary Hutson [Mary.Hutson@aptissoftware.com]  
**Sent:** Monday, March 06, 2000 1:06 PM  
**To:** 'JIMT@PRTC.COM.COM'  
**Subject:** Your Letter

Jim,

I can't get ahold of the person who is overseeing the distribution of the letter you require. I know that our legal department is working on these documents as well. I will forward the letter as soon as possible, but I'm not sure that it can be today.

Thanks,

Mary Hutson  
Business Analyst  
Aptis, Inc.  
a subsidiary of Billing Concepts Corp.  
Phone: 518-431-7500 Fax: 518-427-1642  
mary.hutson@aptissoftware.com



March 9, 2000

San Antonio Office:  
7411 John Smith Drive  
Suite 200  
San Antonio, TX 78229  
P 210.949.4700  
F 210.949.7100

Albany Office:  
8 Southwoods Blvd  
Albany, NY 12211  
P 518.431.7500  
F 518.427.1642

Glendale Office:  
116 North Maryland Ave  
Lower Level  
Glendale, CA 91206  
P 818.543.1881  
F 818.543.1411

Piedmont Rural Telephone  
Jim Tuttle  
201 Anderson Drive  
Laurens, SC 29360

To all Aptis Clients

Software development at Aptis is in the process of developing our solution to satisfy the Truth in Billing requirements put out by the FCC. At this time we do not feel that we will be able to deliver that solution to all of our clients in time for the April 1 deadline. Therefore Aptis is strongly urging all of its clients to file for an extension with the FCC by March 15. We will contact you in the near future to go over our interpretation and implementation of the FCC requirements with you. If there are any immediate questions regarding this please feel free to contact me at 518-431-7138.

Sincerely,  
  
Sara Van Dusen  
Business Unit Director

**Jim Tuttle**

---

**From:** Sara Van Dusen [Sara.VanDusen@aptissoftware.com]  
**Sent:** Wednesday, March 15, 2000 5:01 PM  
**To:** 'Jim Tuttle'  
**Subject:** TIB

We are asking clients to ask for a 90day extension. This is because we have not had time to evaluate all systems as to which companies will need additional changes. Also parts of the truth in billing requirements were not defined until Feb 10. This has not provided us enough time to analyze and implement these changes in to our plan for each client.

Sara Van Dusen

Business Unit Director

APTIS

A subsidiary of Billing Concepts

Albany Office 518-431-7500

Fax: 518-427-1642

Email: sara.vandusen@aptissoftware.com

**WEST SIDE TELECOMMUNICATIONS, INC.**

West Side Telecommunications, Inc. ("Petitioner") provides exchange and exchange access services to approximately 2,500 access lines in West Virginia and a small portion of Pennsylvania. The Petitioner is not a member of the United States Telecom Association and is a rural telephone company under the Communications Act of 1934, as amended. The Petitioner provides billing and collection services for third party providers including such services for certain interexchange carriers' 1+ traffic and for providers of casual calling and alternate operator services. The Petitioner utilizes TPI to process and print all toll portions of the bills rendered by West Side to its customers for the service providers for which West Side provides billing and collection services. Accordingly, West Side relies upon TPI's billing software and the upgrades it makes for a portion of the end user billing services West Side provides. Petitioner has made frequent periodic contacts with its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements and has made reasonable and good-faith efforts to ensure that TPI would be taking all necessary steps to ensure that the software upgrades and modifications to the TPI billing system would be made in sufficient time to allow proper testing. Despite these efforts, it was not until March 14, 2000 that TPI indicated that it would not be able to meet the April 1, 2000 date, and provided the necessary information that enabled Petitioner to assess what TIB compliance issues remained. Despite the Petitioner's reasonable, good-faith efforts, the delays by TPI in making the necessary software upgrades to its system were beyond Petitioner's control.

Based on the information that TPI has provided to date, Petitioner requests the following waivers for the time periods noted.

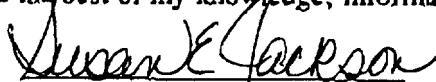
<u>TIB Rule Requirement</u>	<u>Rule Provision(s)</u>	<u>Requested Extension</u>
TIB Service Provider Name and Inquiry Contact Requirement	47 C.F.R. §64.2401(a)(1)-(2) and 47 C.F.R. §64.2401(d)	July 1, 2000

Until the requested waiver expires, the Petitioner will provide the appropriate bill message and/or insert and the customer service responses identified in the Petition.

**DECLARATION OF SUSAN E. JACKSON**

I, Susan E. Jackson, General Manager of West Side Telecommunications, Inc. ("Petitioner"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein and on this attachment regarding Petitioner is true and accurate to the best of my knowledge, information, and belief.

Date 3/24/00

  
Susan E. Jackson  
General Manager

**West Side Telephone Company**  
**Contacts With TeleProcessors, Inc.**

- Several contacts with TeleProcessors, Inc. (TPI) during January, February, and the beginning of March to see what progress made for Truth-in-Billing. TPI informed West Side they were working on it, and everything looked fine to this date.
- March 14, 2000 received a letter from TPI that they received the new billing specifications from Illuminet outlining the module 020A. TPI was making every effort to meet the production deadline of March 21, 2000.
- March 21, 2000, TPI informed us they are not going to be compliant by April 1, 2000, and that they would call with a compliant date as soon as he received more information from Illuminet.
- March 23, 2000, TPI informed West Side they were having some problems with the new module 020A from Illuminet. The module is trying to put a message on each call. TPI has not been able to get sample data for testing purposes as of this date. TPI also needs a more clear and concise program specifications from Illuminet.

The contact number for the calls through Bell Atlantic and AT&T messages were overlooked, but it should not be a problem. Bell and AT&T process direct to TPI.

TPI could not give us a date they think they can be compliant until he receives more information from Illuminet.

- March 24, 2000, received the letter faxed on March 23 as follow-up on conversation the previous morning. TPI's target for completion of this project is late April or early in May. (I received the fax a day late due to West Side's fax machine out of order.)



March 23, 2000

Westside Telecommunications, Inc.  
Karen Hornyak  
Route 1, Box 28A  
Morgantown WV 26505-9704

Dear Karen:

This letter is a follow-up of our phone conversations this morning. Here is where we stand on your Truth in Billing (TIB) requested changes.

We have established a table of Customer Service Representative 1+800 assistance lines for each of the miscellaneous long distance carriers in your area. This table of phone numbers is used as we prepare customer statements each month. When a long distance carrier, other than Westside Telecommunications (Atlantic Bell and AT&T), is identified the CSR number for that carrier is printed on the customer statement. At your request, we are expanding this service so that the Westside Telecommunications CSR number is printed for all Atlantic Bell and AT&T toll pages as well. This minor programming change will be completed prior to your next billing date.

The second issue involves a more extensive alteration of our toll processing system. This new request was brought to our attention in late February. The request from Illuminet and the OBF involves an expansion of the basic Call Detail Record (CDR). This impacts our system in the very early stages of processing your data. We are working to revise the CDR specifications to accommodate the additional data fields at this time. As of this date, however, we have been unable to get any guidance from Illuminet, NECA/INS or from AT&T regarding the proper display of the new information we will be receiving. It appears that each long distance call will be identified by the carrier as (1) a new pre-subscribed provider (2) a new non-prescribed provider or (3) a new unspecified provider. We are trying to determine how to display this information on a "Call By Call" basis without drastically expanding your bill report format. An even larger challenge is to display this information in a way that it can be clearly understood by your customers.

I understand that your legal staff needs to prepare a letter for the FCC with a specific date for compliance with TIB. Given the ability to get a few questions answered, our target for completion of this project is late April or early in May. If we encounter delays, we will notify you immediately.

Thank you for your understanding.

Sincerely,

Ray W. Thomas, TPI

**TeleProcessors, Inc.**

8198 East 46th Street

P.O. Box 472330

Tulsa, OK 74147-2330

918-684-0144

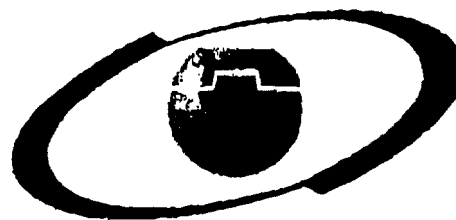
800-808-2432

Fax 918-665-6577

[www.tpsys.com](http://www.tpsys.com)

1449 Fairmont Road  
Morgantown, WV 26501  
304-983-2211  
Fax: 304-983-9950

**WEST SIDE  
TELECOMMUNICATIONS**



**Fax**

**To:** Ray Thomas

**From:** Mary Beth

**Fax:**

**Pages:**

**Phone:**

**Date:** 3-14-00

**Re:** TIB

**CC:**

☐ Urgent    ☐ For Review    ☒ Please Comment    ☐ Please Reply

• **Comments:**

I received your letter in regards to the modifications needed. Thanks for sending so promptly. But, I didn't see anything in regards to the changes needed for [REDACTED] and [REDACTED] messages in regards to a bill message. Did you include them in your modifications for billing or would that be a separate issue. They would also need a message stating that West Side would be the contact & offer our number as a contact 304-983-2211.

Please let me know if this has been considered in your programming changes. We also have to comply with regulations in regards to the messages we process on behalf of [REDACTED] and [REDACTED].

Please respond as soon as possible.

Thanks,

Mary Beth



March 14, 2000

Westside Telecommunications, Inc.  
Mary Beth Seymour  
Route 1, Box 28A  
Morgantown WV 26505-9704

Dear Mary Beth:

We received the new billing specifications from Illuminet outlining the addition of module 020A last week. Thank you for providing this document to us.

The additional information provided by this module will be displayed in proximity to the carrier customer service contact number. Processing and formatting this additional information will require additional system modifications. As you know, the April 1<sup>st</sup> bills for Westside Telecommunications are scheduled for production on March 21<sup>st</sup>. Our programmers will make every effort to provide the additional information at that time. Realistically, I do not believe we will have the necessary time to modify and properly test the system before March 21<sup>st</sup>. Access to the additional information in module 020A should be available with the next bill cycle for your company.

I know software and systems changes are sometimes required at your shop as well. I appreciate the fact that you understand that modifications are not always easy. Even more important, if rushed, they may not be adequately tested. The last thing any of us want is a billing failure. Thank you again for your continued support.

Sincerely,

Ray W. Thomas, TPi

**TeleProcessors, Inc.**

8198 East 46th Street

P.O. Box 472330

Tulsa, OK 74147-2330

918-564-0144

800-806-2432

Fax 918-685-6577

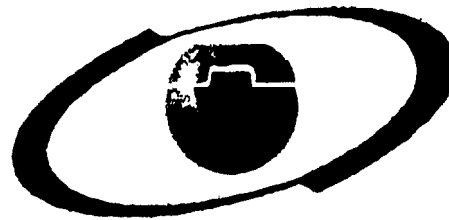
[www.tpisys.com](http://www.tpisys.com)



1449 Fairmont Road  
Morgantown, WV 26501  
304-983-2211  
Fax: 304-983-9950

**WEST SIDE  
TELECOMMUNICATIONS**

**Fax**



**To:** Ray Thomas

**From:** Mary Beth Seymour

**Fax:**

**Pages:** 4

**Phone:**

**Date:** 3-7-00

**Re:** TIB

**CC:**

☒ **Urgent**    ☐ **For Review**    ☐ **Please Comment**    ☐ **Please Reply**

● **Comments:**

I have spoken to Gerri about our need for a written notice explaining when TPI will be ready to comply with TIB regulations. Please send me a letter soon. If you have any questions please call.

2000 MARCH'S 800 CALLS..PAGE 1

CARRIER...ALL Carriers

NUMBER 983-8612

DATE	MINUTES	NUMBER CALLED	CONNECT TIME	CARRIER ID
01/17	3	800-806-2432	2:21pm	110
01/18	3	800-806-2432	4:52pm	110
01/19	6	800-806-2432	3:36pm	110
02/08 — <i>call</i>	5	800-806-2432 <i>no info</i>	12:51pm	110
02/10	6	800-806-2432	11:19am	110
02/10	4	800-806-2432	11:34am	110
6 Total 800-CALLS		Total Minutes....	27	

*Calls made to TeleProcessors, Inc.*

2000 APRIL'S 800 CALLS..PAGE 1

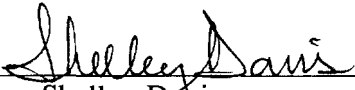
CARRIER...ALL Carriers

NUMBER 983-8612

DATE	MINUTES	NUMBER CALLED	CONNECT TIME	CARRIER ID
02/17	2	800-806-2432	10:07am	110
02/17	3	800-806-2432	10:38am	110
02/17	2	800-806-2432	11:19am	110
02/17	5	800-806-2432	2:34pm	110
02/24	6	800-806-2432	11:19am	110
5 Total 800-CALLS		Total Minutes....	18	

**CERTIFICATE OF SERVICE**

I, Shelley Davis, of Kraskin, Lesse & Cosson, LLP, 2120 L Street, NW, Suite 520, Washington, DC, 20037, hereby certify that a copy of the foregoing "Supplement to March 21, 2000 Petition for Temporary, Limited Waiver" was served on this 24<sup>th</sup> day of March, 2000, by hand delivery to the following parties:

  
Shelley Davis

Lawrence Strickling, Chief  
Common Carrier Bureau  
Federal Communications Commission  
445 12th Street, SW, Room 5-C450  
Washington, DC 20554

Carol Matthey, Deputy Chief  
Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 5B125  
Washington, DC 20554

Glenn T. Reynolds, Division Chief  
Market Disputes Resolution Division  
Enforcement Bureau  
Federal Communications Commission  
445 12th Street, SW, Room 5-A847  
Washington, DC 20554

Katherine Schroder, Deputy Chief  
Accounting Policy Division  
Common Carrier Bureau  
Federal Communications Commission  
445 12th Street, SW, Room 5-C453  
Washington, DC 20554

Deena Shetler, Legal Counsel  
Common Carrier Bureau  
Federal Communications Commission  
445 12th Street, SW, Room 5-C410  
Washington, DC 20554

International Transcription Services  
1231 20th Street, NW  
Washington, DC 20554